

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,

Plaintiff,

V.

LAWNS UNLIMITED, LTD. and  
EDWARD FLEMING,

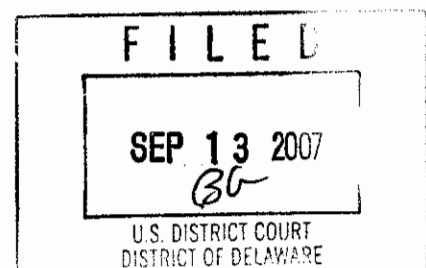
Defendants,

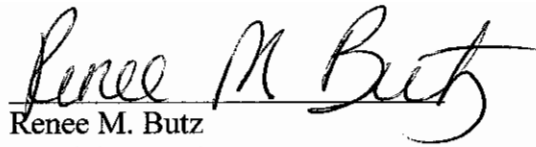
Civ. No. 05-495-JJF  
Judge Joseph J. Farnan Jr.

**MOTION TO EXTEND DISCOVERY**

Plaintiff, hereby move to extend the discovery period, and in support thereof, state the following:

1. During Plaintiff's deposition of Defendants', Defendant introduced new information with regards to their defense that was previously not provided to Plaintiff.
2. Plaintiff requests extension of discovery to enable Plaintiff to obtain documents that would either prove or disprove Defendant's statement.
3. Discovery has been extended twice before at the request of the Defendant's counsel.
4. The current discovery period has been ordered to be completed by September 21, 2007
5. Plaintiff requests the Court to revise the current Scheduling Order to extend the discovery period for another thirty (30) days.



A handwritten signature in black ink, appearing to read "Renee M Butz", written over a horizontal line.

Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

Dated: 9/11/07

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## ORDER

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_ 2007, the Court

having heard and duly considered Plaintiff's Motion to Extend Discovery, **IT IS**

**HEREBY ORDERED** as follows:

Discovery shall be extended for another thirty (30) days on the date this Order is entered, and shall remain open for a period of one month. Dispositive motions shall be served and filed with an opening brief on or before the expiration of thirty (30) days from the close of discovery, at which time briefing shall continue pursuant to D. Del. LR 7.1.2. Any discovery unsuccessfully attempted during the previous discovery period shall be re-served.

United States District Judge

Date: \_\_\_\_\_, 2007

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Motion to Extend Discovery were sent by first-class United States mail, postage duly paid, on this 11<sup>th</sup> day of September, 2007, to counsel of record as follows:

Margaret M. DiBianca  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building, 17<sup>th</sup> Floor  
100 West Street  
Wilmington, DE 19801

  
Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

Dated: 9/11/07

Reene Butz  
58 Highland Dr  
NE MD 21907



~~U.S. MAIL~~ District Court  
Attn: Judge Farnan  
J. Caleb Boggs Federal  
844 N. King Street  
Wilmington DE 19801

